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October 29, 2021

VIA CM/ECF

Hon. Phyllis J. Hamilton
United States District Judge
Oakland Courthouse
3rd Floor – Courtroom 3

Re: Proposed Schedule for Rolling Production
Estate of Rafael Ramirez Lara v. County of Monterey, et al.
Case Number: 4:21-cv-02409-PJH

Dear Judge Hamilton:

Pursuant to the Order Re: Joint Discovery Letter dated October 25, 2021, CM/ECF No. 41, defendant Wellpath submits the following proposed schedule for the rolling production to provide plaintiffs with a timeline for Wellpath's response production of documents, Set One (1). This correspondence is carbon copied and sent separately via e-mail to plaintiffs' counsel Ms. Rifkin and Ms. Budhwani.

The first batch of documents will be produced on or before **November 9, 2021**. The remainder of the production will occur on or before **November 30, 2021**.

Wellpath and all counsel are committed to timely complying with the Court's Orders and completing this production.

Very truly yours,
BERTLING LAW GROUP

/s/

Peter G. Bertling
Jemma Parker Saunders
Attorneys for Defendant Wellpath

cc (via e-mail only): Lori Rifkin
Sairah Budhwani